

The Federal Communications Commission
Washington, D.C. 20554

Subject: Comments concerning RM-10867

I respectfully submit the following comments concerning the proposal by the ARRL, RM-10867, concerning restructuring of the Amateur Radio Service. I am a licensed and active Amateur Radio Operator in the Technician class.

I support the ARRL proposal in principle. However, I disagree with allowing Technician class licensees' automatic upgrades to General class privileges. A more rational alternative would be to require the element 3 General class written exam without the Morse code requirement.

Allowing current no-code technicians the ability to upgrade to General class privileges without the element 3 written exam overlooks many aspects of HF operation that are not part of the current technician class examination.

Respectfully Submitted,

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